Case 21-16804-SLM Doc 32 Filed 05/31/23 Entered 05/31/23 14:55:42 Desc Main Document Page 1 of 1

KML LAW GROUP, P.C.

A Professional Corporation incorporated in Pennsylvania 701 Market Street, Suite 5000 Philadelphia, PA 19106 (215) 627-1322

Attorneys for Rocket Mortgage, LLC f/k/a Quicken Loans, LLC

IN THE MATTER OF:

Barbara Castellano Rocco Castellano

DEBTOR(S),

IN THE UNITED STATES
BANKRUPTCY COURT FOR THE
DISTRICT OF NEW JERSEY

CHAPTER 13 CASE NO. 21-16804 SLM

NOTICE OF MOTION FOR RELIEF FROM STAY

TO:

Barbara Castellano 136 Jerome Place Bloomfield, NJ 07003

Rocco Castellano 136 Jerome Place Bloomfield, NJ 07003

Scott E. Tanne Scott E. Tanne Esq. 4 Chatham Road Summit, NJ 07901

Marie-Ann Greenberg Chapter 13 Standing Trustee 30 Two Bridges Road, Suite 330 Fairfield, NJ 07004-1550

US TRUSTEE Office of the US Trustee One Newark Center, Suite 2100 Newark, NJ 07102

PLEASE TAKE NOTICE THAT the undersigned attorney for **Rocket Mortgage**, **LLC f/k/a Quicken Loans**, **LLC**, will apply to the UNITED STATES BANKRUPTCY COURT, located at **50 Walnut Street 3rd fl.**, **Newark**, **NJ**, for an Order to Grant Relief from the Automatic Stay to authorize the moving parties to prosecute a foreclosure action for the reason that the debtors have failed to maintain their monthly mortgage payments to the Secured Creditor as more particularly set forth in the certification submitted herewith. Costs and counsel fees will also be requested. The property involved is known as **136 Jerome Pl**, **Bloomfield NJ 07003**. The hearing on this matter is scheduled for **06/28/2023 at 10:00 AM**

Dated: May 31, 2023 /s/Denise Carlon

Denise Carlon, Esquire
KML Law Group, P.C.
701 Market Street, Suite 5000
Philadelphia, PA 19106
(215) 627-1322
dcarlon@kmllawgroup.com
Attorney for Rocket Mortgage, LLC f/k/a Quicken Loans,
LLC